

## REMARKS

The claims remaining in the present application are Claims 1-33.

## CLAIM REJECTIONS

### 35 U.S.C. §102

#### Claims 1, 2, 4, 13, 14, 18, 19, 27-30 and 33

In paragraph 3 of the Office Action, Claims 1, 2, 4, 13, 14, 18, 19, 27-30 and 33 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,115,691 by Ulwick et al. (referred to hereinafter as "Ulwick"). Applicants respectfully submit that embodiments of the present invention are neither taught nor suggested by Ulwick.

Claim 1 recites,

"A method for developing a solution to a customer experience issue, said method comprising:

a) identifying a target customer including customer requirements and a customer profile;

b) defining a current customer experience and comparing it with a customer experience provided by a competitor;

c) summarizing values and benefits that should be provided to said target customer;

d) identifying metrics for measuring success of a solution;

e) identifying gaps between current solutions and said benefits; and

f) generating solutions for delivering said benefits and selecting a solution path which delivers the greatest number of benefits" (emphasis added).

Applicants respectfully submit that Ulwick does not teach or suggest, among other things "a customer profile...a customer experience provided by a competitor ...identifying gaps between current solutions and said benefits ..." (emphasis added) as recited by Claim 1.

The Office Action asserts that Ulwick teaches "a) identifying a target customer including customer requirements and a customer profile," as Col. 6 lines 7-10. However, Col. 6 lines 7-10 state, "For each mission that a user may select, all the individuals, groups of individuals or customers that must be considered in order to achieve that mission are identified in advance, and presented to the user." Therefore Ulwick teaches identifying and presenting a list of customers to a user but does not teach "a) identifying a target customer including customer requirements and a customer profile," (emphasis added) as recited by Claim 1.

The Office Action asserts that Ulwick teaches a customer experience provided by a competitor,” at the portion of Figure 19a that states “can organization compete effectively against other organizations.” Col. 6 lines 18-20 indicate that “Desired outcomes for each of those individuals or groups are captured in advance...” However, there is nothing in Ulwick to indicate that a customer experience is provided by a competitor.

The Office Action asserts that Ulwick teaches “e) identifying gaps between current solutions and said benefits,” (emphasis added) at Col. 7 lines 63-67. However, Col. 7 lines 63-67 state, “The user is presented with a means by which to quantify the potential value of each alternative solution...” (emphasis added). However, Ulwick says nothing about “current solutions” and therefore cannot teach or suggest “e) identifying gaps between current solutions and said benefits.”

Therefore, Claim 1 should be patentable over Ulwick for at least the reason that Ulwick does not teach or suggest “a customer profile...a customer experience provided by a competitor ...identifying gaps between current solutions and said benefits ...” (emphasis added) as recited by Claim 1.

Claim 27 recites,

“A method for developing a solution to a customer experience issue, said method comprising:

- a) identifying gaps between current solutions and benefits that should be provided to a target customer;
- b) generating solutions for delivering said benefits and selecting a solution path which delivers the greatest number of benefits;
- c) defining a future customer experience for a selected solution;
- d) developing an architecture for implementing said solution path; and
- e) defining use-cases describing task interactions between participants in said solution path and said solution path.”

Applicants respectfully submit that Ulwick does not teach or suggest “a) identifying gaps between current solutions and benefits that should be provided to a target customer... c) defining a future customer experience for a selected solution... e) defining use-cases describing task interactions between participants in said solution path and said solution path,” as recited by Claim 27.

The Office Action asserts that Ulwick teaches “a) identifying gaps between current solutions and benefits that should be provided to a target customer” at Col. 7 lines 63-67 and Col. 8 lines 10-12. However, Col. 7 lines 63-67 state, “The user is presented with a means by which to quantify the potential value of each alternative solution...” (emphasis added) and Col. 8 lines 10-12 state, “The invention as described herein provides an interactive approach that presents the user with weaknesses and strengths that exist in any solution.” However, nowhere does Ulwick say anything about “e) identifying gaps between current solutions and said benefits,” (emphasis added).

The Office Action asserts that Ulwick teaches “c) defining a future customer experience for a selected solution,” at Col. 8 lines 27-30. However, Col. 8 lines 27-30 state, “Since the value of a potential solution can be determined in advance of its actual development or implementation, the user saves much time, effort and money.” (emphasis added) Col. 8 lines 27-30 say nothing about “a future customer experience,” let alone teach “defining a future customer experience for a selected solution” (emphasis added).

The Office Action asserts that Ulwick teaches “e) defining use-cases describing task interactions between participants in said solution path and said solution path,” at Col. 15 lines 56-59. However, Col. 15 lines 56-59 state, “The objective of this analysis is to ensure that production and delivery is considered in the planning phase of the project, and that the solution will be free from production or delivery issues.” Note that Col. 15 lines 56-59 say nothing about “use-cases” or “task interactions,” let alone say anything about “defining use-cases describing task interactions between participants in said solution path and said solution path.”

Therefore, Claim 27 should be patentable over Ulwick for at least the reason that Ulwick does not teach or suggest “a) identifying gaps between current solutions and benefits that should be provided to a target customer... c) defining a future customer experience for a selected solution... e) defining use-cases describing task interactions between participants in said solution path and said solution path,” as recited by Claim 27.

Claims 2, 4, 13, 14, 18, and 19 depend on Claim 1. Claims 28-30 and 33 depend on Claim 27. These dependent claims include all of the limitations of their

respective independent claims. Further, these dependent claims include additional limitations which further make them patentable. Therefore, these dependent claims should be patentable for at least the reasons that their respective independent claims should be patentable.

35 U.S.C. §103

Claims 3, 5-12, 15-17, 20-26, 31 and 32

In paragraph 5 of the Office Action, Claims 3, 5-12, 15-17, 20-26, 31 and 32 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ulwick in view of U.S. Patent Publication No. 2002/0049621 by Bruce (referred to hereinafter as "Bruce"). Applicants respectfully submit that embodiments of the present invention are neither taught nor suggested by Ulwick or Bruce, alone or in combination.

As already stated, Claims 1 and 27 are patentable over Ulwick because Ulwick fails to teach or suggest "a customer profile...a customer experience provided by a competitor ...identifying gaps between current solutions and said benefits ..." (emphasis added) as recited by Claim 1 and fails to teach or suggest "a) identifying gaps between current solutions and benefits that should be provided to a target customer... c) defining a future customer experience for a selected solution... e) defining use-cases describing task interactions between participants in said solution path and said solution path," as recited by Claim 27. Further, the Office Action does not assert that Bruce teaches or suggests independent Claims 1 and 27. Therefore, independent Claims 1 and 27 should be patentable over Ulwick and Bruce, alone or in combination.

Claim 20 recites,

"A method for developing a solution to a customer experience issue, said method comprising:

- a) collecting data about customers affected by said customer experience issue;
- b) segmenting customers and identifying a customer segment most affected by said customer experience issue, said customer segment representing a target customer;
- c) identifying attributes of said target customer associated with said customer experience issue to generate a customer profile;
- d) generating a customer experience flow by organizing components of a current customer experience according to their order of occurrence, wherein said customer experience flow identifies instances in which customer requirements are unmet;
- e) identifying gaps between attributes of said current customer experience and attributes of a customer experience provided by a competitor;

- f) summarizing values and benefits that should be provided to said target customer; and
- g) identifying metrics for measuring success of a solution.”

Applicants respectfully submit that neither Ulwick nor Bruce, alone or in combination, teach or suggest, “c) identifying attributes of said target customer associated with said customer experience issue to generate a customer profile; d) generating a customer experience flow by organizing components of a current customer experience according to their order of occurrence, wherein said customer experience flow identifies instances in which customer requirements are unmet,” as recited by Claim 20.

The Office Action asserts that Ulwick teaches “c) identifying attributes of said target customer associated with said customer experience issue to generate a customer profile,” at Col. 15 lines 5-8. However, Col. 15 lines 5-8 state “The results of the segmentation analysis often reveal the existence of segments that cut across traditional classification schemes. Each of these segments represents a new market opportunity” (emphasis added). Col. 15 lines 5-8 say nothing about generating a customer profile let alone teach or suggest “c) identifying attributes of said target customer associated with said customer experience issue to generate a customer profile.”

The Office Action asserts that Ulwick teaches “d) generating a customer experience flow by organizing components of a current customer experience according to their order of occurrence, wherein said customer experience flow identifies instances in which customer requirements are unmet,” (emphasis added) at Col. 16 lines 18-21, Col. 7 lines 63-67, and Col. 8 lines 10-12. Col. 16 lines 18-21 state, “The present invention further contemplates the establishment of a finite set of predictive metrics for a given application. Predictive metrics are measurable parameters that predict a desired outcome will occur.” Col. 7 lines 63-67 state, “The user is presented with a means by which to quantify the potential value of each alternative solution. ... Potential solutions are evaluated for their ability to satisfy 100% of the desired outcome.” Col. 8 lines 10-12 state, “The invention as described herein provides an interactive approach that presents the user with weaknesses and strengths that exist in any solution.” However, Ulwick says nothing about “a customer experience flow,” “generating a customer experience flow,” “organizing components,” or “a current customer experience,” let alone teach or suggest “d)

generating a customer experience flow by organizing components of a current customer experience according to their order of occurrence, wherein said customer experience flow identifies instances in which customer requirements are unmet” (emphasis added).

Bruce does not remedy the deficiency in Ulwick in that Bruce does not teach, among other things, “c) identifying attributes of said target customer associated with said customer experience issue to generate a customer profile; d) generating a customer experience flow by organizing components of a current customer experience according to their order of occurrence, wherein said customer experience flow identifies instances in which customer requirements are unmet,” as recited by Claim 20. In fact, the Office Action does not even assert that Bruce teaches “c) identifying attributes of said target customer associated with said customer experience issue to generate a customer profile; d) generating a customer experience flow by organizing components of a current customer experience according to their order of occurrence, wherein said customer experience flow identifies instances in which customer requirements are unmet,” as recited by Claim 20.

Claims 3, 5-12 and 15-17 depend on Claim 1. Claims 21-26 depend on Claim 20. Claims 31 and 32 depend on Claim 27. These dependent claims include all of the limitations of their respective independent claims. Further, these dependent claims include additional limitations which further make them patentable. Therefore, these dependent claims should be patentable for at least the reasons that their respective independent claims should be patentable.

### CONCLUSION

In light of the above listed amendments and remarks, reconsideration of the rejected claims is requested. Based on the arguments and amendments presented above, it is respectfully submitted that Claims 1-33 overcome the rejections of record. For reasons discussed herein, Applicant respectfully requests that Claims 1-33 be considered by the Examiner. Therefore, allowance of Claims 1-33 is respectfully solicited.

Should the Examiner have a question regarding the instant amendment and response, the Applicant invites the Examiner to contact the Applicant's undersigned representative at the below listed telephone number.

Respectfully submitted,  
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